

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR DRAFT PERMIT No. F-02-024

BROWN'S PLATING SERVICE, INC.

PADUCAH, KY.

JANUARY 13, 2004

BRIAN SMITH, REVIEWER

PLANT I.D. # 021-145-00066

APPLICATION LOG # 55242

SOURCE DESCRIPTION:

Brown's Plating Service, Inc. has applied for construction of a trichloroethylene vapor degreaser at their facility in Paducah, Kentucky. The source is a minor source with a state-origin operating permit.

COMMENTS:

The following is a summary of the new emission point to be constructed:

EP #22 - Solvent vapor degreaser

Applicable Regulation: 40 CFR 63, Subpart T

Trichloroethylene and VOC emission factor: 12.2 lbs/gallon based on MSDS.

EMISSION AND OPERATING CAPS DESCRIPTION:

The uncontrolled potential to emit for the degreaser is greater than 10 tons/year. Brown's Plating has elected to take an operating limitation of 1500 gallons/year of trichloroethylene, along with the corresponding emission limitation, to keep their potential emissions below 10 tons/year.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.